

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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BRENDAMARIE ALEXANDER,

Plaintiff,

-against-

**DEFENDANTS' NOTICE OF  
MOTION TO DISMISS THE  
COMPLAINT**

NEW YORK CITY DEPARTMENT OF EDUCATION,  
CEDRIC HALL and CARMEL MACKLIN,

19-cv-07023 (DAB)

Defendants.

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**PLEASE TAKE NOTICE** that upon the Declaration of Assistant Corporation Counsel Rebecca G. Quinn, dated September 17, 2019, and the exhibit annexed thereto, the Memorandum of Law in Support of Defendants' Motion to Dismiss the Complaint dated September 17, 2019, and upon all the papers and proceedings previously had herein, Defendants will move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, Room 2510, New York, NY 10007, before the Honorable Deborah A. Batts, United States District Judge, on a date and time set by the Court for a judgment, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the Complaint against the Defendants on the grounds that the Complaint fails to state a claim upon which relief can be granted, and granting such other and further relief that this Court deems just and proper. Defendants respectfully request a stay of discovery pending the resolution of this motion.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Civil Rule 6.1(b), responses to the moving papers shall be served upon the undersigned within fourteen (14) days after service of the moving papers, and that replies, if any, must be served within seven (7) days of service of any such responses.

Dated: New York, New York  
September 17, 2019

**ZACHARY W. CARTER**  
Corporation Counsel of the  
City of New York  
Attorney for Defendants  
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New York, NY 10007  
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By:                     /s/                      
Rebecca G. Quinn  
Assistant Corporation Counsel

To:

**GILES LAW FIRM LLC** (via ECF)  
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